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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
MICHAEL A. SANDOVAL,  
  
Defendant.

Case No.: 2:19-cr-234-GMN-VCF

**STIPULATION TO EXTEND DATE  
FOR SELF-SURRENDER**

IT IS HEREBY STIPULATED AND AGREED, by and between Thomas W. Flynn and Eric C. Schmale, attorneys for the Plaintiff, United States of America, and George P. Kelesis, Esq. of the law firm of Cook & Kelesis, Ltd., attorney for the Defendant, Michael A. Sandoval, that the Defendant's date for self-surrendering to the Bureau of Prisons, currently scheduled for July 1, 2020, be extended for at least 60 days, due to the ongoing COVID-19 pandemic.

In entering into this stipulation the parties represent that:

1. On January 30, 2020, Michael Sandoval was sentenced to serve 40 months in prison after pleading guilty to tax crimes. He was ordered to self-surrender on May 1, 2020.<sup>1</sup>

2. On March 30, 2020, the U.S. District Court for the District of Nevada issued a temporary general order regarding Court operations in recognition of the serious public health emergency caused by the spread of COVID-19 in the State of Nevada. As part of that Order, the Court extended all hearings, including plea and sentencing hearings, except where serious harm to

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<sup>1</sup> See, February 7, 2020 Judgment in a Criminal Case (ECF 16) (Judgment).

the interests of justice would occur as a result of that delay and, in those instances, hearings were to be conducted via video or teleconferencing. That order remains in effect through June 30, 2020.<sup>2</sup>

3. On April 3, 2020 Attorney General William Barr issued a memorandum requiring the Bureau of Prisons to " . . .immediately maximize appropriate transfers to home confinement of all appropriate inmates" held at certain BOP facilities where COVID-19 is already materially affecting operations.

4. In response to the high risk of accelerated transmission of COVID-19- within jails and prisons, the Bureau of Prisons has suspended all social and most legal visits, prohibited contractor access for all non-essential services, and requires personnel to undergo special screening.

5. In light of these circumstances, on May 17, 2020 Defendant filed an Unopposed Motion to Extend Date for Surrender (Dkt. #17). Defendant's motion was granted and the date for his self-surrender extended to July 1, 2020.<sup>3</sup>

6. The COVID-19 pandemic continues to spread.

7. That extending the Defendant's reporting date for surrender to the Bureau of Prisons is reasonable in light of the aforementioned risks and, therefore, the parties agree to the extension sought herein.

8. This is the second request for continuance of Defendant's reporting date.

DATED this 19<sup>th</sup> day of June, 2020.

Dated this 19<sup>th</sup> day of June, 2020.

COOK & KELESIS, LTD.

UNITED STATES OF AMERICA

By George P. KELESIS  
 GEORGE P. KELESIS  
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 Attorneys for Defendant

By Eric C. Schmale / THOMAS W. FLYNN  
 ERIC C. SCHMALE  
 Assistant United States Attorneys  
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 Las Vegas, Nevada 89101  
 Attorneys for Plaintiff

<sup>2</sup> See, Temporary General Order 2020-05.

<sup>3</sup> See, Order Extending Self-surrender Date (Dkt. 18).

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*Attorneys for Defendant Michael A. Sandoval*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
MICHAEL A. SANDOVAL,  
  
Defendant.

Case No. 2:19-cr-234-GMN-VCF  
  
**ORDER EXTENDING SELF-  
SURRENDER DATE**

**FINDINGS OF FACT**

Based on the Stipulation to Extend Date for Self-surrender, and good cause appearing therefore, the Court finds that:

1. On January 30, 2020, Michael Sandoval was sentenced to serve 40 months in prison after pleading guilty to tax crimes. He was ordered to self-surrender on May 1, 2020.

2. On March 30, 2020, the U.S. District Court for the District of Nevada issued a temporary general order regarding Court operations in recognition of the serious public health emergency caused by the spread of COVID-19 in the State of Nevada. As part of that Order, the Court extended all hearings, including plea and sentencing hearings, except where serious harm to the interests of justice would occur as a result of that delay and, in those instances, hearings were to be conducted via video or teleconferencing. That order remains in effect through June 30, 2020.

3. On April 3, 2020 Attorney General William Barr issued a memorandum requiring the Bureau of Prisons to " . . .immediately maximize appropriate transfers to home confinement of all

appropriate inmates" held at certain BOP facilities where COVID-19 is already materially affecting operations.

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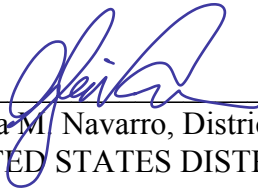
7. That extending the Defendant's reporting date for surrender to the Bureau of Prisons is reasonable in light of the aforementioned risks and, therefore, the parties have agreed to the extension sought herein.

8. This is the second request for continuance of the Defendant's reporting date.

#### **ORDER**

IT IS HEREBY ORDERED that the date set for Defendant, Michael Sandoval, to self-surrender to the Board of Prisons is extended. The defendant shall surrender for service of sentence at the institution designated by the Bureau of Prisons before 2 p.m. on Tuesday, August 18, 2020.

Dated this 22 day of June, 2020.

  
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Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT